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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

JOSEPH TAYLOR, EDWARD MLAKAR,  
MICK CLEARY, EUGENE ALVIS, and  
JENNIFER NELSON, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-CV-07956-VKD

**PLAINTIFFS' RESPONSE TO  
GOOGLE'S STATEMENT OF RECENT  
DECISIONS**

Date: August 19, 2024

Time: 10:00 a.m.

Judge: Hon. Virginia K. DeMarchi

1 On August 8, 2025, Google filed a Local Rule 7-3(d) Statement of Recent Decisions  
2 (Dkt. 219), in which Google submitted *Calhoun et al. v. Google LLC*, No. 4:20-CV-05146-YGR,  
3 2025 WL 1637574 (June 9, 2025) and *Turner et al. v. Apple, Inc.*, No. 5:20-CV-07495-EJD,  
4 2025 WL 1953697 (July 16, 2025) as cases relevant to the Court’s consideration of Plaintiffs’  
5 Motion for Class Certification (Dkt. 175) suggesting they provide “additional support for  
6 denying Plaintiffs’ Motion for Class Certification.” (Dkt. 219 at 1.)

7 Google is incorrect that the *Calhoun* and *Turner* cases are “support for denying” class  
8 certification. *Calhoun* and *Turner* are highly distinguishable from the present case. Both involve  
9 full disclosures of material facts related to the challenged conduct that all users were shown,  
10 which made consent an individualized issue. *Calhoun*, 2025 WL 163574 at \*2 (identifying three  
11 agreements all Google Chrome users were required to agree to that disclosed Google’s collection  
12 of the data at issue); *Turner*, 2025 WL 1953697 at \*1, 4 (statements associated with the settings  
13 at issue clearly disclosed cellular data use for each specific application). By contrast, Plaintiffs in  
14 this action have common, classwide evidence that no setup screen, policy, or toggle discloses the  
15 Challenged Transfers at issue here or that they would use the user’s cellular data, as discussed in  
16 Plaintiffs’ briefing in support of class certification (Dkt. 175, 212-3).

1 Dated: August 11, 2025

Respectfully submitted,

2 KOREIN TILLERY LLC

3 */s/ Chad E. Bell*

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